

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

David Catanzaro,

Plaintiff,

v.

Seaman Garson LLC/LLP, et al.,

Defendants.

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Case No. 1:13-cv-00996

Judge Polster

Magistrate Judge White

RULE 26(A)(1) & (2) INITIAL DISCLOSURES
OF PLAINTIFF, DAVID CATANZARO

Plaintiff, David Catanzaro, makes the following Rule 26(A)(1) and (2) initial disclosures.

Mr. Catanzaro reserves all objections, including those to relevance or admissibility.

I. Rule 26(a)(1): People likely to have discoverable information.

Name	Contact Information	Subjects of Information
David Catanzaro	Contact through counsel only.	All aspects of his claims and potentially information regarding the defendants' affirmative defenses.
James DeRoche	Defendants have contact information.	All aspects of Mr. Catanzaro's claims and potentially information regarding the defendants' affirmative defenses.
Wayne Porter, Jr.	Defendants have contact information.	All aspects of Mr. Catanzaro's claims and potentially information regarding the defendants' affirmative defenses.

Name	Contact Information	Subjects of Information
Seaman Garson LLC/LLP	Defendants have contact information.	All aspects of Mr. Catanzaro's claims and potentially information regarding the defendants' affirmative defenses.
Attorneys who represented Proctor & Gamble and Church & Dwight	Defendants have contact information.	The patent infringement litigation and settlement with Proctor & Gamble and Church & Dwight.
United States Patent & Trademark Office	http://www.uspto.gov/patents/contact_patents.jsp	Mr. Catanzaro's patents.

II. Rule 26(a)(2): Documents and tangible things.

Description	Location
Complete case files for the patent infringement litigation and settlement with Proctor & Gamble and Church & Dwight	In defendants' possession.
All communications between the defendants and Mr. Catanzaro, or between the defendants and others regarding Mr. Catanzaro.	In defendants' possession.
Documents regarding Mr. Catanzaro's patents.	In the possession of Mr. Catanzaro or his counsel; in the USPTO's online databases.
Documents regarding Mr. Catanzaro's settlements with other alleged patent infringers.	In the possession of Mr. Catanzaro or his counsel.

Respectfully submitted,

/s/ Barton R. Keyes

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David Catanzaro

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Rule 26(A)(1) & (2) Initial Disclosures of Plaintiff, David Catanzaro was filed electronically and served electronically on the following counsel of record, this 29th day of October, 2013:

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/s/ Barton R. Keyes